

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

IN RE: AQUEOUS FILM-FORMING	)	
FOAMS PRODUCTS LIABILITY	)	MDL NO. 2:18-mn-2873
LITIGATION	)	
	)	This Document Relates to:
	)	LIONEL THOMAS v. 3M et al.
	)	2:23-cv-05829-RMG
	)	

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD**

Pursuant to Local Rule 83.I.07(B), Michael A. London of Douglas & London, P.C. (“D&L”), counsel of record for Hazel Lucille Thomas as the Proposed Administrator of the estate of Lionel Thomas, moves this Court for an Order permitting leave to withdraw as counsel of record for Hazel Lucille Thomas as the Proposed Administrator of the estate of Lionel Thomas, in the above-captioned multidistrict litigation.

1. On March 13, 2024, the Court entered CMO 28 ECF No. 4681 that requires that any claimant that wishes to move forward alleging an injury other than the Leach injuries—kidney cancer, testicular cancer, ulcerative colitis, thyroid disease—or with liver cancer and thyroid cancer (the “Proceeding Injuries”), the plaintiff must tender full medical records by October 21, 2024 (180 days after April 24, 2024) and provide an expert report supporting the injury by December 20, 2024 (240 days after April 24, 2024). Further on April 9, 2024, Amended CMO 28 ECF No. 4824 was entered. Under Amended CMO No. 28, the Court will allow cases that are voluntarily dismissed without prejudice to toll their statute of limitations for four (4) years.
2. Upon information and belief, Plaintiff Lionel Thomas was diagnosed with prostate cancer on or about 2017, a non-Proceeding Injury.

3. After CMO 28 was entered, on April 15, 2024, our office sent Hazel Lucille Thomas as the Proposed Administrator of the estate of Lionel Thomas, a letter explaining CMO 28 and its benefits and requested that they execute a Stipulation dismissing their case.
4. Having received no response, our office sent additional letters on July 15, 2024; and August 24, 2024; and March 10, 2025. No response was received.
5. Our office additionally sent emails to Hazel Lucille Thomas as the Proposed Administrator of the estate of Lionel Thomas, on April 30, 2024; July 30, 2024; and March 10, 2025. This was in addition to several phone calls where voicemails were left, advising Hazel Lucille Thomas as the Proposed Administrator of the estate of Lionel Thomas, to call my office.
6. After months of Hazel Lucille Thomas as the Proposed Administrator of the estate of Lionel Thomas, failing to respond to any of our communications or cooperate in any way, a significant conflict has arisen between Plaintiff, and D&L as counsel, making it unreasonably difficult for D&L to continue to represent Plaintiff in this action. Under these circumstances of non-cooperation, failure to communicate and otherwise failing to fulfill the client's obligations to participate, D&L is unable to represent Plaintiff, and therefore requests leave to withdraw as counsel of record in this matter.
7. Counsel has advised Hazel Lucille Thomas as the Proposed Administrator of the estate of Lionel Thomas, of their intent to withdraw from this matter with a minimum of a twenty (20) day notice. We still have received no response.
8. Granting this motion would not delay MDL proceedings or otherwise prejudice Defendants, as this matter is part of MDL 2873 and is not yet not scheduled for trial.
9. A copy of this file-stamped motion and an explanation of the Plaintiff's right to and how to object to this withdrawal within seventeen (17) days will be served upon the Plaintiff.
10. Plaintiff's, Hazel Lucille Thomas as the Proposed Administrator of the estate of

Lionel Thomas, last known mailing address and phone number are 7805 Royal Fern Ct., Clinton, MD 20735. Bowling Green, KY 42101; (240) 888-7482.

WHEREFORE, the attorneys of record for Plaintiff with the law firm of Douglas and London, P.C., request that they be allowed to withdraw as counsel of record for Plaintiff Hazel Lucille Thomas as the Proposed Administrator of the estate of Lionel Thomas,

Dated: July 21, 2025

**Douglas & London, P.C.**

By: s/ Michael A London  
Michael A. London, Esq.  
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*Counsel for Plaintiff*

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**ATTORNEY DECLARATON IN SUPPORT OF MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL**

I, Michael A. London, declare and state as follows:

1. I am a member of the Law Offices of Douglas & London, P.C., counsel of record for the Plaintiff herein, *IN RE: Aqueous Film-Forming Foams Products Liability Litigation* (hereinafter referred to as the 'MDL').
2. The facts contained herein are within my personal knowledge, and if called upon as a witness I could and would competently testify to the following under oath.
3. Since the complaint was filed in this action in the United States District Court of South Carolina on November 14, 2023, a conflict has arisen between Plaintiff and their Counsel, making it unreasonably difficult for Douglas & London, P.C. to represent Plaintiff in this action.
4. Granting the within motion will not cause unnecessary delay to Mr. Thomas's case, and would not otherwise be inequitable.
5. No case-specific discovery has been completed in this matter and no trial date has been set. Therefore, withdrawal will not cause any delay in trial, will not adversely affect the client's interests, and will not otherwise be inequitable.

6. Numerous attempts were made to both contact and advise Hazel Lucille Thomas as the Proposed Administrator of the estate of Lionel Thomas, to sign the stipulation to dismiss their case without prejudice as laid out in CMO 28, on such dates; April 15, 2024; May 15, 2024; May 22, 2024; May 28, 2024; June 7 2024; August 1, 2024; September 3, 2024; May 29, 2025; June 5, 2025; and June 20, 2025.

7. A copy of this Motion has been sent to Hazel Lucille Thomas as the Proposed Administrator of the estate of Lionel Thomas, via certified mail on July 21, 2025.

I declare under penalty of perjury under the laws of the United States of America and the State of New York that the foregoing is true and correct, and that this Declaration was executed on this 21st day of July, 2025 at New York, New York.

Dated: July 21, 2025

RESPECTFULLY SUBMITTED,

/s/ Michael A. London

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**CERTIFICATE OF SERVICE**

I do hereby certify that on this 21st day of July 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court and served using the CM/ECF system. A copy was also served upon Plaintiff at their last known address, 7805 Royal Fern Ct., Clinton, MD 20735 by depositing same in the U.S. Mail, postage prepaid.

s/ Michael A London  
Michael A. London, Esq.

